

A TRUE COPY

Jul 02, 2021

s/ Daryl Olszewski

Deputy Clerk, U.S. District Court
Eastern District of Wisconsin

UNITED STATES DISTRICT COURT

for the
Eastern District of WisconsinIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)USPS Priority Mail parcel
9505514432991180568193

Case No. 21 MJ 123

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A.

located in the Eastern District of Wisconsin, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. 841(a)(1) and 843(b)	distribution and possession with intent to distribute a controlled substance, and unlawful use of a communication facility to facilitate the distribution of a controlled substance

The application is based on these facts:

See the attached affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



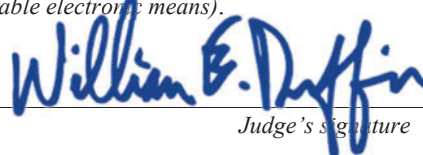
Applicant's signature

Tyler Fink, U.S. Postal Service, OIG

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone (specify reliable electronic means).

Date: 07/02/2021



Judge's signature

City and state: Milwaukee, Wisconsin

William E. Duffin, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Tyler Fink, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a Special Agent with the United States Postal Service (“USPS”) Office of Inspector General (“OIG”). I have been employed by the USPS OIG since December 2020.

2. The USPS OIG is an independent law enforcement, investigative, and oversight agency for the United States Postal Service and is charged under Title 18, United States Code, Section 3061 with the enforcement of laws governing use and movement of the United States mail, including but not limited to misuse of and fraudulent schemes involving the mail, crimes relating to mail fraud, identity theft, and narcotics trafficking.

3. I am currently assigned to the USPS OIG Milwaukee Office, Office of Investigations, Narcotics Team, as well as being placed on the High Intensity Drug Trafficking Area (“HIDTA”) Opioid and Methamphetamine Task Force. The USPS OIG Narcotics team investigates employee misconduct involving narcotics, prohibited mailings, controlled substances, and other matters related to the Postal Service. The Milwaukee Office’s team has intercepted numerous parcels, which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity.

4. I hold a Bachelor of Science degree in Mechanical Engineering from the University of Missouri – St. Louis. In 2014, I completed the Peace Officer Standards and Training certification at the St. Louis County and Municipal Police Academy while employed as a City of Creve Coeur Police Officer. While working as a Police Officer, I received extensive training in narcotics investigations. In 2017, I graduated from the United States Postal Inspection Service

(“USPIS”) Basic Inspector Training program. I received advanced training by the USPIS in the investigation of controlled substances or proceeds being transported through the United States.

5. I have participated in numerous complex narcotics investigations which involved violations of state and federal controlled substances laws including Title 21, United States Code, Sections 841(a)(1) and 846 (possession with intent to distribute a controlled substance and conspiracy to possess with intent to distribute a controlled substance), and other related offenses. I have had both formal training and have participated in numerous complex drug trafficking investigations, including ones using wiretaps. More specifically, my training and experience includes the following:

- a. I have utilized informants to investigate drug trafficking. Through informant interviews and extensive debriefings of individuals involved in drug trafficking, I have learned about the manner in which individuals and organizations distribute controlled substances in Wisconsin and throughout the United States.
- b. I have also relied upon informants to obtain controlled substances from traffickers, and have made undercover purchases of controlled substances.
- c. I have participated in several search warrants where controlled substances, drug paraphernalia, and drug trafficking records were seized.
- d. I am familiar with the appearance and street names of various drugs, including marijuana, heroin, cocaine, cocaine base (unless otherwise noted, all references to crack cocaine in this affidavit is cocaine base in the form of crack cocaine), ecstasy, and methamphetamine. I am familiar with the methods used by drug traffickers to package and prepare controlled substances for sale. I know the street values of different quantities of the various controlled substances.
- e. I am familiar with the language utilized over the telephone to discuss drug trafficking, and know that the language is often limited, guarded, and coded.
- f. I know that drug traffickers often use electronic equipment and wireless and land line telephones to conduct drug trafficking operations.
- g. I know that drug traffickers commonly have in their possession, and at their residences and other locations where they exercise dominion and control, firearms, ammunition, and records or receipts pertaining to such.

- h. I have assisted in court authorized wiretaps and have been trained to operate the equipment utilized to conduct such operations.
- i. I know that drug traffickers often put their telephones in nominee names to distance themselves from telephones that are utilized to facilitate drug trafficking.
- j. I know that drug traffickers often use drug proceeds to purchase assets such as vehicles, property, and jewelry. I also know that drug traffickers often use nominees to purchase or title these assets to avoid scrutiny from law enforcement officials.

6. I have been the affiant on over 80 warrants in federal court. Based on my training, personal experience, on the job training, and working with other USPS OIG Special Agents and Wisconsin HIDTA drug task force officers, I know narcotics, drugs, paraphernalia, controlled substances, and moneys associated with the sale of narcotics, drugs, and controlled substances are sent through the USPS system, and I am familiar with many of the methods used by individuals who attempt to use the USPS to illegally distribute controlled substances.

PURPOSE OF AFFIDAVIT

7. This affidavit is made in support of a search warrant for the **SUBJECT PARCEL** (described below) for items which constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance) and 843(b) (unlawful use of a communication facility to facilitate the distribution of a controlled substance). To seize: any controlled substance, and any paraphernalia associated with the manufacture and distribution of controlled substances including packaging materials and containers to hold controlled substances; proceeds of drug trafficking activities, such as United States currency, money orders, bank checks, precious metals, financial instruments; and drugs or money ledgers, drug distribution or customer lists, drug supplier lists, correspondence, notations, logs, receipts, journals, books, records, and other documents noting the

price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed.

PARCEL TO BE SEARCHED

8. This affidavit is made in support of an application for a search warrant for USPS Priority Mail parcel 9505514432991180568193 (“**SUBJECT PARCEL**”). The **SUBJECT PARCEL** is approximately a 12” x 12” x 8.5” USPS parcel weighing approximately 10 lbs. 2 oz. The **SUBJECT PARCEL**’s label indicates it is from “Michelle Carter, 2847 N. Lincoln St., Burbank, CA 91504.” The **SUBJECT PARCEL** bears a handwritten label addressed to “6072 North 40th St., Milwaukee, WI, 53209.” The **SUBJECT PARCEL** was postmarked on June 29, 2021 in Glendale, California 91206. The postage paid was \$46.30.

PROBABLE CAUSE

9. I review Postal Service records and labels of parcels delivered to the State of Wisconsin from source narcotics areas or sent to those source narcotics areas from Wisconsin. I do this because I know, based on my training and experience, drug traffickers will sometimes use USPS Priority Mail service, which is the USPS two-day delivery product. Based on my training and experience with the USPS OIG, I know drug traffickers use Priority Mail delivery service because of its reliability and the ability to track the article’s progress to the intended delivery point. In my training and experience, traffickers will often use fictitious names or addresses and incomplete names and addresses in an attempt to hide their trafficking efforts from law enforcement.

10. On July 1, 2021, I was conducting routine parcel screening at the North Milwaukee Post Office, located at 5995 North Teutonia Avenue, Milwaukee, Wisconsin 53209, when I deemed the **SUBJECT PARCEL** to be suspicious.

11. The Accurint database is a public records product which is designed for law enforcement officers in locating subjects and witnesses, verifying identities of individuals, and gathering background information for use in investigations. A search of the Accurint database revealed no person by the name of Michelle Carter currently lives or has lived at 2849 North Lincoln Street, Burbank, California 91504.

12. The **SUBJECT PARCEL** does not show a name for the intended recipient at 6072 North 40th Street, Milwaukee, Wisconsin 53209. Case agents previously identified two suspicious parcels linked to this investigation destined for this same address. On May 5, 2021, a parcel originating from the same vicinity as the **SUBJECT PARCEL** was shipped to a “Monique Brown.” On June 3, 2021, a parcel again originating from the same vicinity as the **SUBJECT PARCEL** was shipped to a “Walker.” A search of the Accurint database revealed no person by the name of Monique Brown or Walker currently lives or has lived at 6072 North 40th Street, Milwaukee, Wisconsin 53209.

13. Based on my training and experience, I am aware that California is a source area for controlled substances. As such, controlled substances are frequently transported from California via the USPS, and the proceeds from the sale of the controlled substances are frequently returned to California via the USPS or other means. These proceeds are generally in large amounts of money, oftentimes over \$1,000.

14. On July 1, 2021, I met with Task Force Officer Chris Navarrette of the Drug Enforcement Administration and his K9 “CZAR” at the HIDTA office, located at 801 West Michigan Street, Milwaukee, Wisconsin 53233. Together, Officer Navarrette and K9 CZAR are a certified drug detection team. Officer Navarrette informed me K9 CZAR alerts to the odor of a

controlled substance (specifically heroin, cocaine, marijuana, methamphetamine and other controlled substances made with like components) by passively sitting and staring at the area or object emitting or containing the odor of the controlled substances for which he is trained to alert. Officer Navarrette and K9 CZAR have received four weeks (200 hours) of intensive training and certification through Shallow Creek Kennels, deploying and utilizing a drug detection canine. This certification in July 2019 is based on guidelines set forth by the North American Police Work Dog Association (NAPWDA), which is a nationally-based group in partnership with local, state, federal and international agencies including private vendors, law enforcement, and first responders. This training establishes consensus-based best practices for the use of detection canine teams by improving the consistency and performance of deployed teams to improve interdiction efforts and courtroom acceptance. Officer Navarrette and K9 CZAR have detected controlled substances more than 400 times in the past which included training. In each alert, drugs that K9 CZAR is trained to find have been recovered. K9 CZAR alerts have been the basis for more than 30 search warrants and 5 vehicle sniffs.

15. On July 1, 2021, I placed the **SUBJECT PARCEL** on the ground in the HIDTA Office along with four other similarly-sized empty parcels. Officer Navarrette indicated K9 CZAR located and alerted to the **SUBJECT PARCEL**. Officer Navarrette informed me K9 CZAR's alert indicated the presence of controlled substances or other items, such as proceeds of controlled substances, which have been recently contaminated with or associated with the odor of one or more controlled substances.

16. Based upon the information as outlined in this affidavit, I believe there is probable cause to indicate the contents of the **SUBJECT PARCEL** is drug-related and, therefore,

constitutes the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) and 843(b).

17. Because this affidavit is submitted for the limited purpose of securing authorization for a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are essential to establish the necessary foundation for the requested search warrant.

19. The **SUBJECT PARCEL** is currently secured at the HIDTA Office.

ATTACHMENT A
Property to be searched

The property to be searched is USPS Priority Mail parcel 9505514432991180568193 (“**SUBJECT PARCEL**”). The **SUBJECT PARCEL** is approximately a 12” x 12” x 8.5” USPS parcel weighing approximately 10 lbs. 2 oz. The **SUBJECT PARCEL**’s label indicates it is from “Michelle Carter, 2847 N. Lincoln St., Burbank, CA 91504.” The **SUBJECT PARCEL** bears a handwritten label addressed to “6072 North 40th St., Milwaukee, WI, 53209.” The **SUBJECT PARCEL** was postmarked on June 29, 2021 in Glendale, California 91206. The postage paid was \$46.30.

ATTACHMENT B
Property to be seized

All fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance) and 843(b) (unlawful use of a communication facility to facilitate the distribution of a controlled substance).

To seize: any controlled substance, and any paraphernalia associated with the manufacture and distribution of controlled substances including packaging materials and containers to hold controlled substances; proceeds of drug trafficking activities, such as United States currency, money orders, bank checks, precious metals, financial instruments; and drugs or money ledgers, drug distribution or customer lists, drug supplier lists, correspondence, notations, logs, receipts, journals, books, records, and other documents noting the price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed.